

EXHIBIT 2

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16 Attorneys for Defendant
17 FACEBOOK, INC.

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20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN JOSE DIVISION

23 LINDSEY ABRAMS, individually and on
24 behalf of a class of similarly situated
25 individuals,,

Plaintiff,

Case No. 5:07-cv-05378 JF

DEFENDANT FACEBOOK, INC.'S FIRST
SET OF INTERROGATORIES TO PLAINTIFF
LINDSEY ABRAMS

v.

FACEBOOK, INC., a Delaware corporation,,

Defendant.

PROPOUNDING PARTY: FACEBOOK, INC.

RESPONDING PARTY: LINDSEY ABRAMS

SET NUMBER: ONE

Pursuant to Federal Rule of Civil Procedure 33, Defendant Facebook, Inc. ("FACEBOOK") hereby requests that Plaintiff Lindsey Abrabs answer separately and truthfully

1 in writing under oath within 30 days of service hereof each of the Interrogatories set forth below
 2 in accordance with the following Definitions and Instructions set forth below.

3 **I. DEFINITIONS.**

4 Words in CAPITALS are defined as follows:

5 1. YOU or YOUR mean Plaintiff Lindsey Abrams.
 6 2. FACEBOOK MATTER means the above-captioned proceeding.
 7 3. COMPLAINT means the Class Action Complaint filed in the FACEBOOK
 8 MATTER on October 22, 2007.

9 4. KAMBEREDELSON ATTORNEY means any partner, associate, counsel or other
 10 attorney affiliated with the law firm KamberEdelson, LLC that performed any work in connection
 11 with the FACEBOOK MATTER, including any investigation, research, or any other work
 12 performed in preparation of filing the COMPLAINT.

13 5. KAMBEREDELSON STAFF means any employee or independent contractor of
 14 the law firm KamberEdelson, LLC that performed any work in connection with the FACEBOOK
 15 MATTER, including any investigation, research, or any other work performed in preparation of
 16 filing the COMPLAINT.

17 6. The connectives “and” and “or” shall be construed either disjunctively or
 18 conjunctively, as necessary to bring within the scope of the discovery request all responses that
 19 might otherwise be construed to be outside of its scope.

20 7. The word “each” as used herein includes the word “every,” and the word “every”
 21 herein includes the word “each,” as necessary to bring within the scope of the discovery request
 22 all responses that might otherwise be construed to be outside of its scope.

23 8. The word “any” as used herein includes the word “all,” and the word “all” herein
 24 includes the word “any,” as necessary to bring within the scope of the discovery request all
 25 responses that might otherwise be construed to be outside of its scope.

26 9. The word “all” as used herein includes the word “each,” and the word “each”
 27 herein includes the word “all,” as necessary to bring within the scope of the discovery request all
 28 responses that might otherwise be construed to be outside of its scope.

1 **10.** The term "in connection with" as used herein means relating to, referring to,
 2 concerning, mentioning, reflecting, pertaining to, evidencing, involving, describing, depicting,
 3 discussing, commenting on, embodying, responding to, supporting, contradicting, or constituting
 4 (in whole or part), as the context makes appropriate.

5 **11.** Wherever used herein, the singular shall include the plural and the plural shall
 6 include the singular.

7 **II. INSTRUCTIONS**

8 **1.** With respect to any claim of privilege by you regarding any information,
 9 document, or communication sought by any of FACEBOOK's Interrogatories, you are hereby
 10 requested, to identify each such communication, information, or document withheld on grounds
 11 of an alleged privilege, and specifically set forth the following:

- 12 (a) the nature and basis of the privilege claimed;
- 13 (b) the author(s);
- 14 (c) the addressee(s), including the recipients of copies;
- 15 (d) the date of the communication, document, or information;
- 16 (e) the subject matter of the communication, document, or information;
- 17 (f) if the privilege claimed is the attorney-client privilege, an indication of which
 18 author(s) or addressee(s) is/are attorneys; and
- 19 (g) any other information necessary to support the claim of privilege.

20 **2.** If you find the meaning of any term in these Interrogatories to be unclear, you
 21 should assume a reasonable meaning, state what that assumed meaning is and respond to the
 22 request on the basis of that assumed meaning.

23 **3.** If you object to any subpart of an Interrogatories or object to providing certain
 24 information requested, state your objection and answer the unobjectionable subpart(s).

25 **4.** The following Interrogatories are continuing and you are reminded of your
 26 obligation for timely supplementation pursuant to rule 26(e) of the Federal Rules of Civil
 27 Procedure.

1 **III. INTERROGATORIES.**

2 1. State the name and title of each KAMBEREDELSON ATTORNEY and
 3 KAMBEREDELSON STAFF.

4 2. State the number of hours each KAMBEREDELSON ATTORNEY and
 5 KAMBEREDELSON STAFF spent performing any work in connection with the FACEBOOK
 6 MATTER, including any investigation, research, or any other work performed in preparation of
 7 filing the COMPLAINT.

8 3. Describe all tasks performed by each KAMBEREDELSON ATTORNEY and
 9 KAMBEREDELSON STAFF in connection with the FACEBOOK MATTER, including any
 10 investigation, research, or any other work performed in preparation of filing the COMPLAINT.

11 4. State the standard billing rates for each KAMBEREDELSON ATTORNEY and
 12 KAMBEREDELSON STAFF.

13 5. Identify all fees, expenses, and costs paid or incurred by Plaintiff Abrams or the
 14 law firm KamberEdelson, LLC in connection with any expert witness retained by Plaintiff
 15 Abrams or the law firm KamberEdelson, LLC in connection with the FACEBOOK MATTER,
 16 including fees, expenses, and costs related to the retainer of such expert witness, the preparation
 17 of expert witness reports, and any investigation, research, or any other work performed by the
 18 expert witness, including work performed in preparation of filing the COMPLAINT.

19 6. Identify all other fees, expenses, and costs paid or incurred by Plaintiff Abrams or
 20 the law firm KamberEdelson, LLC in connection with the FACEBOOK MATTER, including any
 21 investigation, research, or any other work performed in preparation of filing the COMPLAINT.

22 7. State the total amount of fees, expenses, and costs invoiced by the law firm
 23 KamberEdelson, LLC to Plaintiff Abrams in connection with the FACEBOOK MATTER.

24 8. State whether Plaintiff Abrams made any complaints to FACEBOOK or otherwise
 25 communicated to FACEBOOK concerning any of the allegations in the COMPLAINT prior to
 26 October 22, 2007. If so, describe in detail the nature and content of such complaints or
 27 communications.

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1 9. State the phone number associated with Plaintiff Abrams's wireless phone that
2 allegedly received the text messages that are the subject of the COMPLAINT.
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5 Dated: June 9, 2008

COOLEY GODWARD KRONISH LLP
MICHAEL G. RHODES (116127)
ROBERT R. VIETH (Virginia-24304)

6 By 
7 MICHAEL G. RHODES

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10 Attorneys for Defendant
11 FACEBOOK, INC.

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PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of California. I am employed in San Diego County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley Godward Kronish LLP, 4401 Eastgate Mall, San Diego, California 92121. My e-mail address is maraujo@cooley.com. On the date set forth below I served the documents described below in the manner described below:

DEFENDANT FACEBOOK, INC.'S FIRST SET OF INTERROGATORIES TO PLAINTIFF LINDSEY ABRAMS

(BY U.S. MAIL – CCP § 1013a(1)) I am personally and readily familiar with the business practice of Cooley Godward Kronish LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at San Diego, California.

(BY MESSENGER SERVICE – CCP § 1011) by consigning the document(s) to an authorized courier and/or process server for hand delivery on this date.

(BY FACSIMILE – CCP § 1013(e)) I am personally and readily familiar with the business practice of Cooley Godward Kronish LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.

(BY OVERNIGHT MAIL – CCP § 1013(c)) I am personally and readily familiar with the business practice of Cooley Godward Kronish LLP for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by Federal Express for overnight delivery.

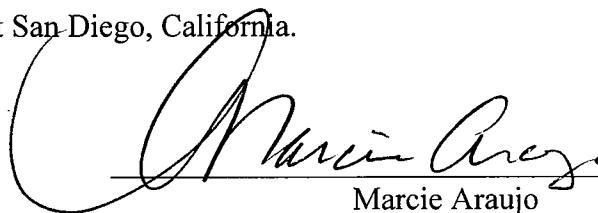
(BY ELECTRONIC MAIL – CCP § 1010.6(a)(6)) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused such documents described herein to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

on the following part(ies) in this action:

1 Jay Edelson, Esq.
2 Kamberedelson, LLC
3 53 West Jackson Blvd., suite 550
4 Chicago, IL 60604
5 Attorneys for Plaintiff LINDSEY
6 ABRAMS

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8 I declare under penalty of perjury under the laws of the State of California that the above
9 is true and correct.

10 Executed on June 9, 2008, at San Diego, California.



11 Marcie Araujo

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